

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§ Chapter 11
FIELDWOOD ENERGY LLC, et al.	§ Case No. 20-33948 (MI)
Debtors.¹	§ (Jointly Administered)
	§ <u>Hearing Date:</u> June 18, 2021
	§ <u>Hearing Time:</u> 9:30 AM (CT)
	§ <u>Hearing Location:</u> Electronic (Audio & Video)
	§ <u>Judge Presiding:</u> Marvin Isgur

**HCC INTERNATIONAL INSURANCE COMPANY PLC'S
COMBINED WITNESS AND EXHIBIT LIST**

HCC International Insurance Company Plc (the “*HCCI*”) submits the following combined Witness and Exhibit List for the Confirmation Hearing scheduled on June 18, 2021, at 9:30 AM (CT), before the Honorable Marvin Isgur, United States Bankruptcy Judge. The hearing will be held electronically.

WITNESS LIST

1. Lily W. Cheung, P.E., Vice President and Team Leader, Netherland, Sewell & Associates, Inc.
2. Michael Dane, CFO – Fieldwood Energy, LLC
3. Jon Graham, Sole Manager - FWE I
4. Martin Ward or another representative of HCCI
5. Any witness designated or called by any party; and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

6. Any witness required for rebuttal.

EXHIBIT LIST

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1	Doc. No. 723 – Disclosure Statement for Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors				
2	Doc. No. 1285 – Revised Disclosure Statement				
3	FWE-0000017, YE2020 ARIES File with FWEI Breakout HIGHLY CONFIDENTIAL				
4	FWE-0000008, FWEI One-lines HIGHLY CONFIDENTIAL				
5	FWE-0000016, FWEI Company Plan HIGHLY CONFIDENTIAL				
6	FWE-0038675, Updated FWEI Company Plan Model HIGHLY CONFIDENTIAL				
7	FWE-0045265, Fields not returning to production, Plans for currently shut-in fields HIGHLY CONFIDENTIAL				
8	FWE-0045403 Total Abandonment with FWEI Break out HIGHLY CONFIDENTIAL				
9	Doc. No. 1285-2 – Exhibit O to Disclosure Statement, Financial Projections				
10	Relativity Pull 2_26_2021.xls – lease list, type, operator, acre, status HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
11	NTL No. 2018-G03 — U.S. Department of the Interior Bureau of Safety and Environmental Enforcement Gulf of Mexico OCS Region — Notice to Lessees and Operators of Federal Oil and Gas Leases and Pipeline Right-of-Way Holders in the Outer Continental Shelf, Gulf of Mexico OCS Region				

12	FWE I Lease List.xls HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
13	FWE-0035293 — Lease Operating Statements HIGHLY CONFIDENTIAL				
14	FWE-0000006 — Damage Report CONFIDENTIAL				
15	FWE-0035294 – Lease Suspension of Production and related documents CONFIDENTIAL				
16	FWE-0035378 — Incident of Noncompliance record HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
17	FWE-Surety-00008842 — Accounting statement of Trust A CONFIDENTIAL				
18	FWE-Surety-00008840 — Decommissioning Trusts Overview HIGHLY CONFIDENTIAL				
19	FWE-Surety-00008858 — MY2020 Reserves One-lines HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
20	FWE Disclosure Statement OG Lease Exhibits DRAFT 03.06.21_1545 HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
21	Houlihan Lokey Valuation Expert Report HIGHLY CONFIDENTIAL				
22	Oral Deposition of Debtor Fieldwood Energy, LLC's 30(b)(6) Representative, Michael T. Dane — May 13, 2021				
23	Oral Deposition of Jon Graham — June 2, 2021				
24	Deposition Cupit Brett (Apache) 06.03.21				
25	Debtors' Responses and Objections to Joint Surety Interrogatories and Request for Production of Documents from the Debtors				

26	FWE-0000008 - FWEI Onelines_YE2020_LWC Comments HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
27	FWE-0045403 Total Abandonment with Field Status HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
28	FWEI Summaries 1P Revised HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
29	HCCI - PoC - Fieldwood Energy				
30	HCCI - PoC Fieldwood Energy Offshore				
31	HCCI - PoC - Fieldwood SD Offshore				
32	HCCI - PoC - GOM Shelf LLC				
33	HCCI - General Indemnity Agreement				
34	HCCI - Letter of Credit				
35	HCCI - Participation Agreement				
36	HCCI - Surety Claims Sharing Agreement				
37	HCCI - Reimbursement Agreement				
38	HCCI - Collateral Demand Letter				
39	Everest Bond				
40	FWE-0049079_HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
41	FWE-0049108_HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
42	FWE-0049109_HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
43	April 12 2016 Agreement				
44	OWL 7 – Offshore well and lease database, primary sources of information are from the Bureau of Ocean Energy Management (BOEM) and Bureau of Safety and Environmental Enforcement (BSEE)				

	Any pleadings or exhibits previously filed on the Court's docket.				
	Any demonstrative exhibits necessary for the Hearing.				
	Any exhibit identified or offered by any other party.				
	Any exhibit necessary for impeachment and/or rebuttal purposes.				

HCCI reserves the right to modify, amend, or supplement this Witness and Exhibit List at its discretion at any time prior to hearing in this matter.

HCCI Exhibits 3, 4, 5, 6, 7, 8, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 26, 27, 28, 40, 41, and 42 are marked “Confidential” or “Highly Confidential” pursuant to the Amended Stipulated Protective Order (Doc. No. 989) (the “Protective Order”) and have been filed under seal.

Because of issues with file size or file formatting, the following exhibits could not be filed on the ECF electronic filing system and instead have been provided to the Court via physical media (on a thumb drive): HCCI Exhibits 4, 5, 6, 8, 10, 12, 13, 16, 18, 19, 20, 26, 27, 28, and 41. Parties to the Protective Order may request copies of these documents from the undersigned.

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Respectfully submitted,

/s/ Simon R. Mayer

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CERTIFICATE OF SERVICE

I certify that, on June 16, 2021, a true and correct copy of the foregoing Witness and Exhibit List and the associated exhibits was served on all parties who receive service in the above-captioned bankruptcy proceeding via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Simon R. Mayer

Simon R. Mayer